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Attorney for defendant Sean Michael Cole

**FILED**  
DISTRICT COURT OF GUAM

JUN 24 2005

MARY L.M. MORAN  
CLERK OF COURT

DISTRICT COURT OF GUAM

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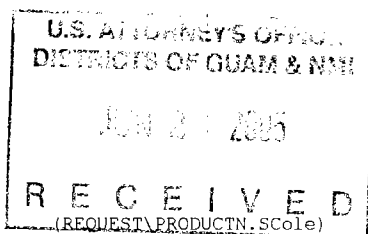
UNITED STATES OF AMERICA,	(	Criminal Case No. 05-00039
	)	
Plaintiff,	(	REQUEST FOR PRODUCTION
	)	OF EXCULPATORY AND
vs.	(	IMPEACHMENT EVIDENCE
	)	(BRADY V. MARYLAND, 373
GERARDO ELOY GONZALEZ, JR., et	(	U.S. 83 (1963).)
al.,	)	
	(	
Defendants.	)	


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Defendant Sean Michael Cole requests that the government produce all evidence favorable to defendant and material either to guilt or to punishment including, but not limited to, all information about its witnesses that could cast doubt upon their credibility, and in connection with the latter, that the government undertake, in accordance with the policy set forth in United States v. Jennings, 960 F.2d 1488, 1492 n.3 (9th Cir. 1992), an examination of the personnel files of its law enforcement officer witnesses for such material.

Dated, Hagåtña, Guam,

June 24, 2005.



  
HOWARD TRAPP  
For HOWARD TRAPP INCORPORATED  
Attorney for defendant  
Sean Michael Cole

ORIGINAL

DECLARATION OF SERVICE

I, Leilani Ada, declare that I am an administrative assistant employed in the office of Howard Trapp Incorporated, Howard Trapp, Esq., the attorney for defendant Sean Michael Cole herein, and that I served the document to which this declaration is annexed on Marivic P. David, Esq., Assistant United States Attorney, the attorney for plaintiff herein, by leaving a copy at Office of the United States Attorney for Guam and the Northern Mariana Islands, Suite 500, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam, Ms. David's last known address, with a person in charge thereof, on June 24, 2005.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 24, 2005, at Hagåtña, Guam.

  
LEILANI ADA